

Exhibit B

From: [Emi MacLean](#)
To: [Cappelletti, Daniel \(CIV\)](#); [Weiland, William H. \(CIV\)](#)
Cc: [Jessica Bansal Contact](#); [Ahilan Arulanantham](#); [Erik Crew](#); [Amanda Young](#); [Diana Sanchez](#)
Subject: RE: NTPSA II--Production Ordered
Date: Monday, October 20, 2025 10:30:00 AM
Attachments: [image001.png](#)

Daniel and Will,

We have not received a response from you regarding our Thursday email (reiterated on Friday) requesting confirmation about the details of Defendants' compliance with Judge Kim's discovery order. I reached Daniel this morning just after noon ET, and he said that he understood that Will intended to send an email at noon ET today which might eliminate our need to seek judicial intervention. I tried to reach you both again just now, as we still have not received any response. We will be obliged to seek judicial intervention today if Defendants will not confirm their commitment to promptly and fully comply with Judge Kim's order, and produce all withheld DPP documents and portions of documents, and produce the identified ACP and LEP documents or portions of documents for which Judge Kim overruled the invocation of privilege.

Please give me a call if useful to discuss.

Best,
Emi



Emi MacLean
Pronouns: she/her/hers
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From: Emi MacLean
Sent: Friday, October 17, 2025 5:31 PM
To: 'Cappelletti, Daniel (CIV)' <daniel.cappelletti@usdoj.gov>; 'Weiland, William H. (CIV)' <william.h.weiland@usdoj.gov>
Cc: Jessica Bansal Contact <jessica@ndlon.org>; Ahilan Arulanantham <arulanantham@law.ucla.edu>; Erik Crew <ecrew@haitianbridge.org>; Amanda Young <ayoung@aclunc.org>; Diana Sanchez <DianaSanchez@aclusocal.org>
Subject: RE: NTPSA II--Production Ordered

Daniel and Will,

We have not received a response to the email below. Please reply by 9 am PST on Monday regarding Defendants' compliance with Judge Kim's discovery order. We will seek judicial intervention on this on Monday if we cannot reach resolution.

Best,
Emi



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From: Emi MacLean
Sent: Thursday, October 16, 2025 4:37 PM
To: Cappelletti, Daniel (CIV) <daniel.cappelletti@usdoj.gov>; Weiland, William H. (CIV) <william.h.weiland@usdoj.gov>
Cc: Jessica Bansal Contact <jessica@ndlon.org>; Ahilan Arulanantham <arulanantham@law.ucla.edu>; Erik Crew <ecrew@haitianbridge.org>; Amanda Young <ayoung@aclunc.org>; Diana Sanchez <DianaSanchez@aclusocal.org>
Subject: NTPSA II--Production Ordered

Will and Daniel,

In light of Judge Kim's order (Dkt. 155, attached), Defendants are compelled to produce all documents or portions of documents Defendants have withheld pursuant to the deliberative process privilege among the responsive documents Defendants have identified, as well as the specific documents or portions of documents for which Judge Kim overruled the attorney-client privilege or law enforcement privilege. Because these documents already have been gathered by Defendants, and it is just a matter of producing or re-producing specific documents without redactions, please confirm that Defendants will produce these documents no later than next Tuesday, October 21. It is critical that Plaintiffs receive these documents as soon as possible given the ongoing summary judgment briefing. If we cannot reach agreement on a date certain by when Defendants will produce these materials, then we will seek guidance from Judge Kim.

Best,

Emi



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